

State of Oregon  
Department of Environmental Quality

Memorandum

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**Date:** May 9, 2019

**To:** Wally Moon, EPA Region 10, Removal Program

**From:** David Anderson, Oregon DEQ, Eastern Region Spill Manager

**Through:** Mike Zolitsch, Oregon DEQ, Acting HQ Spill Manager  
Linda Hayes-Gorman, Oregon DEQ, Eastern Region Division Administrator

**Subject:** Request for EPA Removal Support – Wallowa Lake Drum Site, Joseph, Oregon, ECSI No. 6320

The purpose of this memorandum is to request removal support from the EPA Removal Program for the Wallowa Lake Drum site (Site) located outside of Joseph, Oregon in Wallowa Lake. It is DEQ's determination that any responsible parties are unknown at this time to undertake required response and cleanup actions.

DEQ has determined the Site a high priority for response and additional investigation of identified 2,4-D and 2,4,5-T ("Agent Orange") drums located at the bottom of Wallowa Lake. The presence of drums represents possible direct contact of sediment, surface water, and possibly drinking water exposure pathways. Currently, it is unknown if the Site poses a significant, ongoing threat to human health and the environment. DEQ believes that an interim removal action measure (IRAM), is needed to ensure protection of human health and the environment.

DEQ is requesting that EPA's Removal Program conduct removal and sampling of apparently intact and non-intact drums at the Site to reduce the current threat to human health and the environment. Following the removal, DEQ will work with EPA and other agencies to characterize the Site through either the DEQ's Site Assessment or Orphan Site Program.

The following sections provide additional background and detail for the Site.

**Location**

The Site is located at the south end of the four mile long Wallowa Lake near the small unincorporated recreational community of Wallowa Lake. The drums are apparently in an area from 35 to 85 foot depth with the approximate coordinates of Latitude 45.287034, Longitude - 117.212603 and near the Wallowa Lake Marina and Wallowa Lake State Park. Wallowa Lake Marina is located at 72214 Marina Lane, Joseph, Oregon 97846.

**Environmental Background and History**

In fall 2018, a scuba diver discovered a 55-gallon drum at the bottom of Wallowa Lake with lettering indicating that once held an herbicide.

Drums have been discovered at the lake bottom for years, a remnant of the days when empty drums were used extensively at the lake to float and anchor docks. It was common practice for people to fill the drums with water, rock or cement and anchor the drums with rope to floating

docks or mooring floats. Drums were also commonly used to float docks. Over the years, as the docks disintegrated or were removed or abandoned, many of the drums remained, especially those used as anchors. The herbicide drum was discovered in an area not commonly found in past reports. Another drum that once held herbicide was also found in the same area.

In September 2018, DEQ received another complaint regarding drums in the Lake. This complaint indicated drums in a different part of the lake as that which has historically received complaints.

Blue Mountain Divers, a local diving group out of Walla Walla, WA, was conducting a club dive to help remove garbage and solid waste when it observed both 55-gallon and 100-gallon drums in the lake. Subsequent photos and video documentation indicated that there were intact drums with “2,4-D”, “2,4,5-T”, and “Weed Killer” labels.

Additional communication with Blue Mountain Divers by EPA concluded that approximately one dozen 100-gallon intact drums are present at a depth of approximately 85 feet depth. In addition, two dozen non-intact drums are also present in the same area.

#### **Current Potentially Responsible Party Status**

DEQ has not determined if there are viable responsible parties to undertake necessary investigation and cleanup actions at the Site

#### **Current Environmental Concerns**

Intact drums and non-intact drums possibly represent a direct threat to sediment and surface water at the Site.

Wallowa Lake is the primary drinking water source for the City of Joseph. Initial assessments by DEQ and OHA’s Drinking Water program indicate the drums pose no risk to the lake or the city’s drinking water. OHA’s drinking water database for the City of Joseph currently shows no detections of pesticides or herbicides.